

10. THE DISPOSAL OF ALL OTHER WASTE
GENERATED DURING THE DECOMMISSIONING OF THE PLANT

During the decommissioning that occurred in the later half of 1987, waste was collected from a variety of discontinued manufacturing and material handling operation and included over 300,000 pounds of hazardous waste . This waste came from many sources but primarily from 55 gallon drums and smaller dispensing containers whose contents were only partially used. These containers were collected by US&S personnel and placed in a centrally located area for compatibility review and disposal.

For example, in July of 1987 when nearly 500 partially filled drums and containers, of liquid organic materials were consolidated into one tank truck, shipped to Ensco Corporation's Eldorado, Arkansas Facility, and incinerated (Ref. Exhibit 10.1).

The collection consolidation procedure was also performed with respect to drums containing solid waste for offsite disposal. (Ref. Exhibit 10.2).

Another issue during decommissioning was to address the stock inventory that may have been classified as hazardous waste if not used by the final day of manufacturing operations. The material was sold back to the original vendor whenever possible. If this was not possible US&S sought out other industries who would have commercial use for the material in question and sold it to them. Only after all efforts to minimize waste were exhausted, otherwise usable materials were classified as waste and disposed in accordance with all federal, state, and local regulations.

This brought us to the point of doing a final clean-up tour of all the buildings. Work crews proceeded through the buildings of the plant on their final clean-up tour, to pick up all paints,glues, miscelleaneous chemicals, containers, soap, cleansers and anything else that could be potentially considered a hazardous waste. These materials were then taken to a staging area in the basement of each building being reviewed. There they were segragated for compatability by the environmental co-ordiantor and transferred to 55 gallon drums and disposed of in accordance with all Federal, State, & Local Regulations.

The containers from the decommissioning were systematically processed through the the plant drum crusher by US&S personnel. The aerosol cans that had been depressurized were systematically put in one gallon cans, which were put in 5 gallon cans, and then put into 55 gal drums and crushed. The crushed containers were then sold as scrap.

The final activity before leaving any building was to remove all miscellaneous personal property and trash and to sweep clean each room and leave it completely empty.



STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-562-7444

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Exhibit 10.1

Form Approved. OMB No. 2050-0039. Expires 9-30-88

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Union Switch & Signal Div. American Standard Inc. 1789 South Braddock Avenue, Swissvale, PA. 15218		P A D 0 0 0 0 0 1 1 1 5		A. State Manifest Document Number AR-165416		
4. Generator's Phone ()		6. US EPA ID Number 0 H D 0 0 0 7 7 2 5 5 8		B. State Generator's ID		
5. Transporter 1 Company Name 7-7 Incorporated		8. US EPA ID Number		C. State Transporter's ID H 294PC976		
7. Transporter 2 Company Name				D. Transporter's Phone (216) 336-8877		
9. Designated Facility Name and Site Address Ensco Inc. American Road ElDorado, Arkansas 71730		10. US EPA ID Number A R D 0 6 9 7 4 8 1 9 2		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (501) 863-7173		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	
a. Waste Flammable Liquid Nos. Flammable Liquid, UN 1993		No. Type	5000	Gal	F003 D001 F005	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above Mixed Organic Liquids		K. Handling Codes for Wastes Listed Above M.D.Tourdot (412) 244-3183				
if no alternate TSDF, return to generator						
15. Special Handling Instructions and Additional Information Proper Personal Protective Equipment						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name M. D. Tourdot		Signature <i>M. D. Tourdot</i>		Month Day Year 10 7 3 0 8 7		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>LESERWIRER</i>		Month Day Year 10 7 3 0 8 7		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space Received 36,640#						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name DERI GILES		Signature <i>Deri Giles</i>		Month Day Year 10 7 3 0 8 7		

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

ER-SWM-51:REV. 10/86

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)
Form Approved, OMB No. 2050-0039 Expires 9-30-88

Exhibit 10.2

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P A D 0 0 0 0 0 1 1 1 5 0 0 0 0		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address Union Switch and Signal 1789 S. Braddock Ave. Pittsburgh, PA. 15218						A. State Manifest Document Number PAB 4671225			
4. Generator's Phone ()						B. State Gen. ID			
5. Transporter 1 Company Name 7 - 7 Inc.						6. US EPA ID Number O H D 0 0 0 7 7 2 5 5		C. State Trans. ID PA-AH	
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone (800 221-6096	
9. Designated Facility Name and Site Address Cecos International Inc. 5092 Aber Road Williamsburg, Ohio 45176						10. US EPA ID Number O H D 0 8 7 4 3 3 7 4		E. State Trans. ID PA-AH 0 2 3 8	
						F. Transporter's Phone ()		G. State Facility's ID Not Required	
						H. Facility's Phone (513 724-6114			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity	
a. Hazardous Waste Solid N.O.S. ORM-E NA 9189 (D-006)						0 0 1 CM		2 0 0 . 0 0	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)						K. Handling Codes for Wastes Listed Above			
a. Haz. Code Physical State T S Cadmium and Cyanide con & Debris						c. Haz. Code Physical State		a. Landfill c.	
b.						d.		b. d.	
15. Special Handling Instructions and Additional Information WO# 261001 PC# 11551-AAB EES Byff Job # 312082									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name M. D. Tourdot						Signature Month Day Year 09 02 87			
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name Dennis L. Anderson						Signature Month Day Year 09 02 87			
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name Kent Hecton						Signature Month Day Year 09 04 87			

PAB 4671225